

**FILE**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DEC 07 2000

CLERK'S OFFICE  
U.S. DISTRICT COURT  
EASTERN MICHIGAN

IN RE:

DOW CORNING CORPORATION,  
  
DEBTOR.

Case No. 99-CV-75960

Case No. 99-CV-75924

Case No. 99-CV-76214

Case No. 99-CV-76215

Case No. 00-CV-70029

**MOTION OF APPELLANT, MARTI JACOBS FOR A STAY,  
AND MEMORANDUM IN SUPPORT OF THE MOTION FOR REHEARING  
AND REQUEST FOR STAY FILED BY THE NEVADA CLAIMANTS**

The appellant ("Appellant"), a "Class 5," "Personal Injury Claimant" as these terms are defined in the Amended Joint Plan of Reorganization, as modified (the "Plan"), who previously had Dow Corning silicone gel-filled breast implants ("Claimant"), hereby submits this Motion ("Motion") for a Stay. Appellant has no reason to doubt that the Plan Proponents will waive the condition in paragraph 7.2.1 of the Plan and begin implementing the Plan. If they do so, they will succeed in preventing this Claimant from having the significant issues raised in her appeal, including the release and injunction issues, reviewed by other Courts with jurisdiction over this bankruptcy.

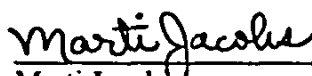
Appellant also concurs with the arguments of the Nevada Claimants that the November 13, 2000 Opinion ("Opinion") contains defects which, if corrected, will result in a different disposition of appeals involving the release and injunction issues. As the Nevada Claimants point out, the finding in the Opinion that the Plan does not limit the rights of claimants to recover against the Shareholders in the Litigation

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Facility was incorrect. Accordingly, Appellant supports the Motion for Rehearing and Request for Stay filed by the Nevada Claimants.

Dated: December 6, 2000  
Tempe, Arizona

Respectfully submitted,



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Marti Jacobs  
1739 E. Broadway Rd., # 1-107  
Tempe, AZ 85282-1684  
Phone (480) 731-2989  
Fax (480) 831-3030

**CERTIFICATE OF SERVICE**

I, Marti Jacobs, an Appellant in this proceeding, do hereby certify that on December 6, 2000, I served the foregoing Motion for a Stay and Memorandum in Support of the Motion for Rehearing and Request for Stay filed by counsel for the Nevada Claimants, which was postmarked on November 25, 2000, upon Counsel for each of the following parties by causing a copy of the same to be delivered by first-class mail, postage prepaid, to the following. Also a copy was sent by facsimile on this day, December 6, 2000 to those indicated with facsimile numbers:

Counsel for the Nevada  
Claimants:

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Counsel for the TCC:

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Counsel for Dow Chemical:

Mayer, Brown & Platt  
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Counsel for the Commercial  
Committee:

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Counsel for the Physician's  
Committee:

Benesch Friedlander Coplan & Aronoff  
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Cleveland, OH 44114-2378

United States Trustee:

Office of the United States Trustee  
Attention: Leslie Berg  
477 Michigan Avenue, Suite 1760  
Detroit, Michigan 48226

I declare under penalty of perjury that the foregoing facts herein are true and  
correct.

Marti Jacobs  
Marti Jacobs  
Appellant

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Dated: December 6, 2000  
Tempe, Arizona